

Plantwide Applicability Limits Continued

NSR Retooling Team

October 29, 2003

Wisconsin Department of Natural Resources

Ideas suggested on October 15

- ✓ Set baseline in nonattainment areas at a year certain (2000 or 2003 as examples)
- ✓ Have two distinct PAL approaches, attainment and nonattainment areas
- ✓ Provide certainty into reasons to reopen a PAL
- ✓ Opt-out clauses
- ✓ Compliance demonstration and monitoring too onerous

Establishing a PAL

- ✓ Attainment Area PALs
- ✓ Use Federal PAL with DNR's baseline actual emission rate definition plus significant threshold in attainment areas excluding clean units
- ✓ Maintain NSR avoidance caps
- ✓ PAL term is 10 years
- ✓ PAL termination - PAL is allocated to emissions units, unless unit has clean unit status

Nonattainment Area PAL

- ✓ Use Federal PAL with DNR's baseline actual emission rate definition plus significant threshold and decline to BACT levels for significant units in nonattainment areas by end of PAL term - PAL level excludes Clean Units
- ✓ Maintain NSR avoidance caps
- ✓ PAL term is 10 years
- ✓ PAL termination - PAL is allocated to emissions units, unless unit has clean unit status

Clean Unit Opt Out

- ✓ Units gaining Clean Unit status on date PAL established excluded from PAL
 - Must be designated clean on PAL date
- ✓ Emissions Unit in PAL can be removed from PAL by gaining Clean Unit status
- ✓ Allows Emission Unit to increase utilization to levels approved in CU determination

Clean Unit Opt Out Example

- ✓ Plant with 5 emissions units (PM_{10})
 - P10 (10 tons in baseline)
 - P20 and P30 (20 tons in baseline each)
 - P40 (40 tons in baseline)
 - P50 has BACT permit (20 tons in baseline)
- ✓ PAL level equals
 - $10 + 20 + 20 + 40 + 15$ (sign threshold) = 105
and covers P10 - P40

Clean Unit Opt Out Example (con'd)

- ✓ Facility determines need for growth on P40
 - Apply for CU designation for P40
 - P40 needs to day's BACT/LAER to gain status
 - Status would run to end of PAL term
- ✓ PAL Adjusted
 - $10 + 20 + 20 + 15 = 65$ and now covers P10 - P30. P40 and P50 can recapture lost capacity/utilization levels approved under CU

PAL Monitoring Requirements

- ✓ PAL permit must contain enforceable requirements to determine PAL emissions
- ✓ Source may use any of the following:
 - Mass balance
 - Continuous emission monitoring systems (CEMS)
 - Continuous Parameter Monitoring Systems (CPMS) or Predictive Emissions Monitoring Systems (PEMS)
 - Emission Factors (validated under NR 439 testing frequency)
- ✓ If no monitoring data exists for a period, potential emissions must be used

Reopening a PAL

- ✓ Reviewing Authority shall reopen the PAL permit to:
 - Correct typographical or calculation errors made in settling the PAL.
 - Reduce the PAL to create emissions reductions for offset purposes.
 - Revise the PAL to reflect an increase in the PAL.
- ✓ Reviewing Authority may reopen the PAL permit to:
 - Reduce the PAL to reflect newly applicable Federal requirements with compliance dates after the PAL effective date
 - Reduce the PAL consistent with any other requirement that the State may impose under its SIP
 - Reduce the PAL if it determines that a reduction is necessary to avoid causing or contributing to a NAAQS or PSD increment violation.